

IR PARTNERING NAS JACKSONVILLE SEPTEMBER 15-16, 1994 PORTLAND, MAINE

Attendees: Visitors:		NAS Jacksonville Management Edge NAS Jacksonville ABB - ES NAS Jacksonville SOUTHDIV F.D.E.P. U.S. EPA Bechtel ABB - ES ABB - ES SOUTHDIV ABB - ES NORTHDIV NORTHDIV	904-772-2717 207-799-8687 904-772-2717 904-269-7012 904-772-4033 803-743-0628 904-488-3935 404-347-3555 615-220-2450 904-269-7012 904-269-7012 803-743-0581 703-769-8124 610-595-0567 X159 610-595-0567
	Cheryl Mitchell	NAVSTA Mayport	904-270-6730 X31

15 September 94 Team Huddle at 1325

Action (NAS): Marian Lareau to revise phone list (Bechtel-Lynn and Herman)

Ground rules were read by Mr. Gartland.

It was announced that this is the last meeting for

Ms. Lareau.

- 1. Presentation by Partnering Group at CINCLANTFLT IR Conference: Comments included the following: Presentation went well; many non-believers became believers, question of regulators buy-in, went very well; conference personnel were asking positive questions; James and Jorge made a big difference. Team indicated that Partnering has accelerated completion of IROD, ROD for OU1. Partnering may be regarded as preferential treatment for facility where James Hudson indicated Federal facilities are treated differently by USEPA due to funding.
- 2. Miriam Lareau stated DOD has Partnering Guide (Draft) Manual
- 3. Fred Milton stated DOD IR is doing investigation to determine if DOD is doing more in cleanup
- 4. Kevin Gartland indicated that Ron Johnson (USEPA) spoke at Navy Regional Environmental Conference and indicated that EPA wears different hats, but successfully partners with the Navy in the Southeast.

(Note that the numbers are for ease of reference)

- 5. Lessons Learned for Partnering Team:

 If in time crunch or need help pick up phone and ask for help.
- 6. Action (EPA): James H to mail meeting minutes from last meeting (Aug 16/17) by 22 Sept 94.
- 7. Problem Resolution (entered by W. Browne)

We have scheduled to a certain time but some people have not followed through and have left prior to the meeting end.

- Possibility 3 day meeting travel on day 1, work second day, half meeting plus travel. Jorge C has trouble with this due to his schedule - Homestead.
- Possibility 3 day at greater timeframe spacing. James H expressed view that he has to be at meeting or people will say he is not "partnering". Meet people needs:
- Possibility Eric or Jim to cover for Jorge (Tier II Link)
- Possibility Evening meeting
- Possibility Schedule locations (Tallahassee/Atlanta)
- Possibility Tier II input
- Possibility Have Telecon 1-2 days prior to meeting and/or after meeting.
- Possibility Same as above but 3 days with 1300 start/stop. Jorge C. has problem with due to workload
- Possibility Meeting every 6 weeks for 3 days with Telecon 2 day on either side or both.
- 8. ACTION (ALL) Team review resources on personnel for DEP/EPA. Pass to Tier II if team can not solve.

James Hudson needs flexibility but will meet on Saturday, meeting need to be flexible either 6 weeks or as needed for emergency.

9. Consensus:

Meet every 5 weeks (Calendar) with only team "action items" on agenda Telecon 1 week before meeting with Agenda in hand at Telecon. Meeting to start at 0900; end second day at 1600.

- 10. ACTION (SDIV): SOUTHDIV to set up 1-800# (needs day/time).
- 11. ACTION (NAS) B. Raspet agenda to be in hand during Telecon. Nex meeting 19-20 October at Atlanta)per telecon on the 12th Oct), at 0900 start and end 1600 on 20th. James Hudson to be in charge.
- 12. Soil Gas Program OU1
- No need to chase PCB, no need to do soil sampling.
- Grid OU1 landfill for soil gas (no attempt to look for sources within the landfill. 75' grid)
- Magnetometer in past study indicates material in Weapons area

- Active soil gas, similar to what had been done at Housing
- Probe 3-4 penetration
- Go on large grid, then get closer spacing at spots which show activity.
- Use site GC work Bechtel to support with IH personnel

OU1: Consideration of future use of area: consider site as source; Jorge C to look at bigger picture, alternate use of site; final cap may be the solution.

13. If hot spots found, is removal planned? Metals are all over the site landfill which will be the source of metals over the next 30-40 years. Hot spots defined as Volatile/Semi volatile. There is a question of the number of barrels disposed- not of concern due to past practices. Jorge indicated that the 4 pits are the major sources. ROD by SEPTEMBER 95. Proceed without delineation - monitor of soil gas - not soil parameters - soil gas to be monitor to 17-770 parameters.

ACTION (ALL) Answer Jorge C question what's the goal of the Navy for PSC 26 and 27 (OU1) after soil gas survey.

- 14. Consensus: ABB to do soil gas at 75' interval (field decision to go to 150') without delineation with no wells. Monitor for volatile and semi-volatile. At completion options include review possibility of IRA for Hot Spot or leave for ROD. Use data for engineering of ROD.
- 15. OU2 PSC 3, 42 IRA Status: RI/FS is out. 28 day review schedule ACTION (ALL) Review PSC 3 & 42 draft Final RI/FS for OU2.
- 16. **ACTION (SDIV)** OU3 Soil Vapor Extraction Test: SOUTHDIV to review ABB POA.
- 17. DOD Site Priority Ranking System FY-96 ranking; qualitative model for high, medium, low; 60% of sites are high or medium sites in qualitative ranking; Navy "Pracer" is quantitative model.
- 18. ACTION (SDIV): SOUTHDIV to distribute the guidance document.

ACTION (SDIV) SOUTHDIV to brief NAS JAX priority model status input.

- 19. Partnering Team on Lessons Learned: Abide by team start/stop times. Don't schedule meetings for Fridays.
- 20. REVIEW OF FIRST DAY BY PARTICIPANTS

Lynn Sims - impressed by review times. Disappointed that more agenda item were not covered and those that were done quickly. Meeting schedule seemed to be beat some items into the ground. (Successes)

Honesty, support each other, giving 120%, stay through hard part, push to resolve issue, meet each other needs, and hardworking group. (Need Improvement) Realistic expectation of what needs/can be done.

Chuck McGuire (CINCLANTFLT) - Move dirt.

21. OU2 2, 41, 43 IROD reviewed by DEP, EPA - ACTION (ALL) Comments to ABB by 23 SEPT.

Comments on OU2, PSC 2, 41, and 43 proposed plan - Respond to public comment - J Hudson indicated that all comments need to be addressed in the "responsiveness comment". IROD can be signed even without written response to comments as long as the response is in the responsiveness section. Comments coming in at the end of the comment period only need to be commented on in the responsiveness comment.

ACTION (NAS): IROD signed by 30 SEP for OU2 2, 41, and 43.

Comments are due by the following schedules: FDEP/EPA - FDEP by 16 SEP, EPA by 20 SEP, STATION to response to comments by 25 SEP, ABB Final by 27 SEP, signature by CO by 30 SEP.

22. RDS - Review Comments Status (RRDS) - from FDEP/EPA/STN/SDIV - Risk based decision making process.

ACTION (ALL): A 30-day extension for all, look at risk in 2nd set. ACTION (ABB): to mail outs 6 additional appendices to all parties.

23. Site Screening RDS: EPA indicated that they would do site screening: Site screening - NFRAP or Risk based; Work plan - sampling plan; turnaround time; and complete field work. RDS can modify work plan from Homestead.

How detailed is site screening? Work plan; Fred Sloan - observational methodology. \$40K is left for site screening with ABB (CTO40).

24. **ACTION: (EPA):** EPA to set conference call reference Site Screening including the following items for discussion:

Who to fund - EPA or Navy EPA capability to do SS

EPA capability to do SS Funding: Will EPA do with EPA funds as need - Navy funds Navy must move funds to 1st Qtr to meet SMP

Extent of work plan - matrix

Concerns were expressed of number of samples and where to sample. Per telecon on the 12 Oct, Mr Gartland indicated that M Hartnett stated that EPA would only do limited number of sites.

25. **ACTION NAS:** Bill to provide tour/intensive site visit to facilitator/SDIV/ PAO/ Bechtel/Priory after next JAX Partnering meeting.

26. **ACTION ITEMS:** (July Meeting)

K. ...

(NAS): Bill to set for team brief CO at JAX Partnering meeting ref partnering initiatives how it has increased cleanup (BAR CURVE). Brief to be expanded to allow brief out to EPA/Slate. Spent \$275,000 for partnering which saved \$2.1M per SDIV statistics.

(NAS): Straw man to team by next meeting.

<u>Consensus:</u> Jorge to finalize "Flow chart of Partnering" as approved by Team during meeting (Action complete).

(NAS): Check with Jack Banning on drainage near Hurricane/Braun.

BECHTEL: Bechtel has sent revised WP on RAD comments back, included agreements. Bechtel to ensure all members have copy.

BECHTEL: Bechtel to provide locations of off-site background sample locations to PAO (Miriam Lareau).

<u>SDIV:</u> SDIV to review POA, in contracts for award. Site near 4th tee, no RAD screening required to implement.

<u>SDIV:</u> Confirm with DEP - 17-770 verses CERCLA Petroleum sites to be handled under 17-770. Ensure that if changed, sites only contain 17-770 constituents and will not come back over back to CERCLA. Letter from SDIV to FDER to transfer sites 7 and 19). SDIV to send letter for two sites to be handled under Chapter 17-770.

Kevin Gartland reported that PWCs to operate LNAPL system. SDIV to fund/task. LNAPL - validate funds are in place.

Brief on ECO Risk - OU1 Baseline/Human Health Risk Assessment. ABB developed OU1 Base ECO Risk Assessment Mr. Trainer needs all field data by end of CY. Possible need to sample in summer months due to lack of diversity comments by FDEP. Tom offered to meet with FDEP/EPA on risk. Kevin Gartland indicated Norm Richards took summer samples.

FDEP: Check if comments were sent/if sufficient - sent two years ago. FAX Comments. If meeting held need J. Mitchell, FDEP; S. Maynard, Station; NOAA (Abyno), US FWS (if they come), EPA.

ABB to set up agenda, report back to team, Trainer concerned that his may hold up FY95 ROD.

Consensus. Bechtel is a member of NAS JAX Team

Issue of representative from Bechtel is in basket for future considerations.

SDIV SDIV to brief Bechtel on roles/representative responsible. Done.

SDIV POA for OU1, Groundwater by 8/19 Done (it is in contracts) SDIV to check with contracts to insure it is awarded.

- POA for RAD by 8/19 Done (Tech Support for RAD), ABB is under contract for support.

NOTE: Bechtel to start RAD work on 1 OCT.

- Additional Surface Water and Sediment at Locations 51 & 56 (near OU1 Creek area) Done
 - Scope OU1 VOC Soil/Gas Done
- Bechtel to ensure all have copies of WP (revised) and letter confirming telephone conversations agreement.
- NAS JAX station provide nearest sanitary sewer for OU1 Groundwater pump test. (Action NAS JAX)
- Bechtel has provided to BK Mooring (SDIV (Code 1855)). (Action Bechtel)
 - NAS JAX get Diane Lancaster MBTI for Wandy. (Action NAS JAX)
 End of Action Items

- 27. DEWEY PARK Status
- a. Easement for City for road (additional investigation-addendum)
- b. Send letter from ABB to all members; lease to City would specify the remove or contain asbestos (City has agreed to perform).

ACTION (SDIV) To send letter on suitability for lease of Dewey Park to State and EPA for concurrence.

- 28. OU3 PLATING SHOP Status
- 1. POA submitted to SDIV not negotiated.
- ABB providing tech support
- 3. SDIV reviewed POA
- 4. SDIV 02 to negotiate
- 29. Health Assessment ASTDR
- a. **ACTION (SDIV)** Coordination by SDIV (Connie Merding SDIV Code 18)

NAS JAX PARTNERING MEETING OF SEP 15-16, 1994

NO ACTION

b. Navy Environmental Health Center Norfolk AS)
Conduct health amount in ten (F.

C. ACTION (SDIV): To contact ASTDR on status of Health

Assessment

- d. ACTION (EPA): EPA to doordinate with ASDT contact on priority
- e. ACTION (SDIV): SDIV to provide NEHC POC to EPA. NOTOWN
- 30. PSC 38 Torpedo Rework Preliminary Funding
- a. RDS had discussion that nuclear material handled in reworking torpedoes.
- b. PSC 38 in RAD survey. Is it needed. Key is if Marines were not at site, authorized with deadly force that nuclear weapons may have been stored.
- 31. Action (NAS, ABB): ABB/NAS to contact LT Mitchell to clarify his comment. Two Switching in minutes have (This is no PSC 38.
- 32. Meeting Dates (Consensus)
 - a. 19-20 October, NAS or alternate depending on 12 Oct telephone
 - b. 28-29 November, NAS or alternate with PHONCON 16 Nov
- c. 10-11 January 95 Tallahassee with telephone conference on 5th at 10 AM. Chair is James
- 33. Facility "Background" Locations and Analysis
- a. Background has it been bought off for facility (see attached sheet
- b. Undisturbed soil that are suggested by ABB as representative areas for background: Sample sites: 41/42; 45/46;, 49/50; 349/40; and 63/64.
- 34. Roadway Impact
- a. Action All: Request input from Team on background analytical can they be used for background acceptance by team.
- 35. Dioxin Sampling

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- a. No plan or sampling dioxin in sediment. James has recommended samples be done. No detection is limited.
- b. Action EPA: James will check on treatment of dioxins at superfund sites. The dioxin types, limits and methods. Junes Slow rules were not been dioxin types.

Action ABB: Test, 10 locations at 0'-1'. I'm of the free Action All: Should we test for Dioxin elsewhere? With Oute Centles in the Court was a least that the contract of the

36. Non-detects statistical methods. In statistical analysis, non detects are calculated at 1/2 the detection level. Agreement by the

PAGE -7

team.

37. Action NAS: NAS to coordinate with ABB on history notebooks. NAS to bring. Action for Mas to provide to keep

38. Budget Execution Plan Update - Goal

a. Dana Gaskins indicated, that per guidance - that site name will be PSC # - put in minutes strawman - if this helps/need new info added contact Raspet.

b. Suggestion: Can we handout execution plan first day, with review

on second day.

c. Notes from Execution Plan

Action (SDIV): SDIV new PSC for possible sludge drying bed at fuel farm (NW) for inclusion in OU3 WP RI/FS - NOY WINNEY

d. Implementation Plan

Action (All): Team review site management plan for Comment.

TO A VILLE - Judge little Illinel.

39. Action (SDIV): OU3 Plating Shop for POA action by 30 SEP 94.

BASKET ITEMS

Basket Item (tie to agenda)

- Bring review comments of FRI/FS for PSC 3,42, to next meeting.
- Team review resource problem (not enough time) before team takes to Tier II
- Site Screening capabilities and extent of work plan (general or detailed). Funding/Execution.
- Briefing by Partnering Team to date COMMAND"
- Meeting agenda for OU1 Baseline/Human Health Assessment.
- Issue of representative from Bechtel. Team set clear guidelines for entrance of member. Delineate action items.
 - ES-FS Team Teleconference responsibility
 - Dioxin in soil/sediment
 - PSC 38 Torpedo Rework Team meeting format need to make improvement.
 - Background sampling
 - Roles and responsibility lest from Atlanta.
- Team set clear guidelines for entrance of team member.
 - At OU1 what is "goal" after soil gas survey
- Add Board Detailer
- Geostatistics
 - Have recorder during PHONECON.

V- Agada Stem for wo gy meeting

AGENDA ITEMS

- Meeting Location
- Soil Gas, OU1
- Execution Plan Update
- Status/Impact on FY95/96 Funding and Beyond
- OU1 LNAPL IRA Work Status
- Geostatistics
- OU1 Surface Water Health Risk Update
- ES/FS Team
- OU2 PSC 2, 41, and 43 IRA/IROD Status and newly discovered contamination at old fuel storage tanks
- OU2 PSC 3, 42 IRA Status
- OU3 Plating Shop Soil Remediation
- OU3 Soil Vapor Extraction Test Status
- RAD Survey
- RDS Review Comments
- Statistical Methods
- PSC 36 Dewey Park Review/Lease to City
- Site Screening Gameplan (EPA or ABB)
- Ecological Assessment NRT Review
- Health Assessment ASTDR Status
- OU1 Dioxin Sampling
- PSC 38 Additional RAD Work
- Brief Priority Model Status/Team Input
- Air Permit for CERCLA Actions
- Field Sampling Plan Soil Vapor Extraction Bldg 106 & 780
- Action List

TABLE 5: CAA SECTION 112 NESHAP SOURCE CATEGORY DEFINITIONS (Continued)

plastics and resins manufacturing; pulp and paper industry; rubber and miscellaneous plastic products; stone, glass, clay, and concrete products; textile manufacturing; transportation equipment; and water treatment. This term does not include mining waste or oil and gas waste. Portions of an MSW landfill may be separated by access roads. An MSW landfill may be publicly or privately owned.

Publicly Owned Treatment Works (POTW)
Emissions - includes emissions from wastewaters which are treated at a POTW. These wastewaters are produced by industrial, commercial, and domestic sources. Emissions from these wastewaters can occur within the collection system (sewers) as well as during treatment at the POTW. Control options include, but are not limited to, reduction of HAP's at the source before they enter the collection system, add-on emission controls on the collection system and at the POTW, and/or treatment process modifications/substitutions.

Sewage Sludge Incineration - includes, but is not limited to, facilities that combust wastes containing more than 10 percent sewage sludge on a dry basis. An incinerator is described as any furnace or other device used in the process of burning waste for the primary purpose of reducing the volume of the waste by removing combustible matter. Types of sewage sludge incinerators include, but are not limited to, multiple hearth, fluidized bed, and electric sludge incinerators.

Site Remediation - includes the cleanup of sites that possess contaminated media. Sites undergoing remediation of contaminated media include, but are not limited to, National Priorities List Sites, Corrective Action Sites, and underground storage tank sites. Units requiring cleanup can include hazardous waste dumps, industrial surface impoundments, leaking tanks, and municipal, industrial, and combined landfills. site remediation includes, but is not limited to. the following activities: contaminated soils cleaning; soil vapor extraction (SVE); groundwater cleanup; oil recovery from below ground; surface flow control; waste material removal from the site; treatment of waste material after removal; and cleansing of water mains, sewers, wetlands, and water bodies that have been contaminated by wastes. Site remediation does not include the installation of

controls to municipal solid waste landfills to comply with the New Source Performance Standards (NSPS) or Clean Air Act (CAA), Section III(D) emission guidelines.

Off-Site Waste Operations formerly called Solid

Waste Treatment, Storage, and Disposal Facilities (TSDF) - includes facilities that treat, store, or dispose of any solid waste received from off-site. as well as facilities that recycle, recover, and rerefine wastes received from off-site. Treatment is described as any method, technique, or process designed to change the physical, chemical, or biological character of the waste. Storage means the holding of waste for a temporary period, at the end of which the waste is treated, disposed of, or stored elsewhere. Disposal is defined as the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste into or on any land or water so that such solid waste. or constituent thereof, may enter the environment or be emitted into the air or discharged into any waters, including ground waters. Recovery is defined as the removal or recapture of a usable product or products from waste. Recycling or re-refining is defined as the processing of a waste either to regenerate or to recover a usable product. [9/22/94 Editors' note: EPA changed the title to emphasize that it applies to facilities that process waste received from offsite. Also EPA changed this definition by removing the word commercial. It now applies to both commercial and noncommercial facilities.)

AGRICULTURAL CHEMICALS PRODUCTION INDUSTRY GROUP

- 2,4-D Salts and Esters Production includes any facility engaged in producing the phenoxy herbicide 2,4-D (2,4-dichlorophenoxyacetic acid) in both salt and ester forms. Production includes any reaction processes of 2,4-dichlorophenol and chloroacetic acid in aqueous sodium hydroxide. Representative chemicals in this category are the sodium salt (60 85 percent acid), amine salt (10 60 percent acid), and ester (10 45 percent acid) forms of 2,4-D. The category also includes, but is not limited to, chlorination and esterification processes.
- 4-Chloro-2-Methylphenoxyacetic Acid Production includes any facility engaged in producing the herbicide 4-chloro-2-methylphenoxyacetic acid. The category includes, but is not limited to, vapor phase methylation processes and production process units.

(Reference: EPA 450/3/91-030, July 1992.

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TABLE 4: CAA §112 NESHAP (Continued)

INITIAL SOURCE CATEGORY LIST (57 FR 31576, 16 JUL 93) AND REGULATORY SCHEDULE (58 FR 63941, O3 DEC 93)

NOVEMBER 15, 2000 (87)

MAJOR SOURCES ONLY: (87)
Aerosol Can Filling Facilities
Alkyd Resins Production
Alumina Processing

Ammonium Sulfate Production-Caprolactam By-

Product Plants

Antimony Oxides Manufacturing Asphalt Concrete Manufacturing

Asphalt Processing

Asphalt Roofing Manufacturing

Asphalt/Coal Tar Application-Metal Pipes

Auto and Light Duty Truck (Coatings) (p20)

Bakers Yeast Manufacturing

Benzyltrimethylammonium Chloride Production

Boat Manufacturing (p26)

Butadiene-Furfural Cotrimer (R-11)

Carbonyl Sulfide Production

Carboxymethylcellulose Production

Cellophane Production
Cellulose Ethers Production

Cellulose Food Casing Manufacturing

Chelating Agents Production
Chlorinated Paraffins Production
Chromium Refractories Production
Clay Products Manufacturing

Coke By-Product Plants

Coke Ovens: Pushing, Quenching and Battery

Stacks

Dodecanedioic Acid Production

Dry Cleaning (Petroleum Solvent) (p32)

Engine Test Facilities (p15)
Ethylidene Norbornene Production

Explosives Production (p32)

Flat Wood Paneling (Surface Coating)

Fume Silica Production

Hazardous Waste Incineration (p22)

Hydrazine Production (p33) Hydrochloric Acid Production Hydrogen Fluoride Production

Industrial Boilers (p15)

Institutional/Commercial Boilers (p15)
Integrated Iron and Steel Manufacturing

Iron Foundries
Municipal Landfills

Large Appliance (Surface Coating) (p21)

Lead Acid Battery Manufacturing

Lime Manufacturing

Maleic Anhydride Copolymers Production

Manufacture of Paints, Coatings and Adhesives

Metal Can (Surface Coating)
Metal Coil (Surface Coating)
Metal Furniture (Surface Coating)
Methylcellulose Production

Mis. Metal Parts & Products (Coatings) (p21)

OBPA/1,3-Diisocyanate Production

Organic liquids Distribution (Non-Gasoline) (p20)

Paint Stripper Users (p33)

Paper And Other Webs (Surface Coating)

Phosphate Fertilizers Production
Phosphoric Acid Manufacturing
Photographic Chemicals Production
Phthalate Plasticizers Production

Plastic Parts & Products (Surface Coating) (p21)

Plywood/Particle Board Manufacturing

Polyester Resins Production

Polymerized Vinylidene Chloride Production Polymethyl Methacrylate Resins Production Polyvinyl Acetate Emulsions Production

Polyvinyl Alcohol Production Polyvinyl Butyral Production

Polyvinyl Chloride and Copolymers Production

Primary Magnesium Refining

Printing, Coating and Dyeing of Fabrics

Process Heaters (p15)

Quaternary Ammonium Compounds Production

Rayon Production

Rocket Engine Test Firing (p34)
Rubber Chemicals Manufacturing
Semiconductor Manufacturing
Sewage Sludge Incineration

Site Remediation (p23)

Spandex Production

Stationary Internal Combustion Engines (p15)

Stationary Turbines (p15)

Steel Foundries

Symmetrical Tetrachloropyridine Production

Taconite Iron Ore Processing

Tire Production

Uranium Hexafluoride Production

Vegetable Oil Production

See Appendix 112B for most recent list and actual regulation schedule

9/22/94 14